



MICHAEL D. KABAT
DIRECT DIAL: 404.400.7301
E-MAIL: mkabat@kcozlaw.com

February 13, 2023

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Eli Reisman v. Northeastern Power and Gas LLC*, No. 1:23-cv-00620

Dear Judge Schofield:

Our firm was recently retained to represent Defendant Northeastern Power and Gas LLC (“NE Power”) in the above-referenced matter. NE Power was served with the Complaint and Summons on January 27, 2023, making its current deadline to answer or otherwise respond to the Complaint February 17, 2023. NE Power respectfully requests an extension of that deadline up to and including March 20, 2023, to allow investigation of the Complaint’s allegations. This is NE Power’s first request for an extension. Plaintiff’s counsel consents to this request. The requested extension will not affect any other scheduled dates, as no other deadlines have been scheduled.

Respectfully submitted,

/s/ Michael D. Kabat

Michael D. Kabat
New York Bar No. 836784
KABAT CHAPMAN & OZMER LLP
171 17th Street NW, Suite 1550
Atlanta, Georgia 30363
Phone: (404) 400-7300
Fax: (404) 400-7333
Attorney for Defendant

cc: All Counsel of Record (via ECF)